

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA

3 JEFFREY SNYDER, D.O.,)
4 an individual,)
5 Plaintiff,)
6 vs.) NO. CIV-16-384-F
7 BOARD OF REGENTS FOR THE)
8 OKLAHOMA AGRICULTURAL &)
9 MECHANICAL COLLEGES, ex rel.,)
10 OKLAHOMA STATE UNIVERSITY)
11 CENTER FOR HEALTH)
12 SCIENCES, et al.,)
13 Defendants.)



14 VIDEOTAPED DEPOSITION OF LINDA MARIE SNYDER
15 TAKEN ON BEHALF OF THE DEFENDANTS
16 IN OKLAHOMA CITY, OKLAHOMA
17 ON AUGUST 21, 2019

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19 REPORTED BY: JANA C. HAZELBAKER, CSR
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1 A No.

2 Q Have any of your sons ever lived in any of
3 your rental properties?

4 A No.

5 Q When I asked what your sons did, you said
6 that Dr. Snyder is not -- doesn't currently have any
7 occupation; is that right?

8 A Yes.

9 Q And he's not had a -- a job since his
10 dismissal from the residency in August --

11 A Yes.

12 Q -- of '15?

13 A Yes.

14 Q Have you ever asked him to get a job?

15 A No, due to his situation.

16 Q What do you mean, "due to the situation,"
17 you've not asked him to get a job?

18 A Because he's trying to seek justice for
19 what has been done.

20 Q Okay. And when I asked if you knew how
21 many hours he worked on this lawsuit, you said you
22 didn't know.

23 A I don't know. I'm not home all the time.

24 Q Have you ever encouraged him to go out and
25 get a job?

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1 A No, because he's very busy.

2 Q Okay. And you just said you -- how do you
3 know he's busy if you're not home a lot?

4 A Well, I'm -- I'm gone, but then I know that
5 he has been busy working because my husband may be
6 there when I'm not there, or vice versa. Or he's
7 doing other things. You know, like I said, you know,
8 he's with the family, you know, he's doing other
9 things, but he -- obviously, I know that he is very
10 studious, he's very methodical, he, you know, works
11 hard to, you know, progress through whatever his task
12 is in life, and that's the way he's always been.

13 Q And those would certainly be good
14 characters -- characteristics or -- or traits in --
15 in a lot of jobs, right?

16 A Exactly.

17 Q So do you think he'd be qualified for any
18 other jobs?

19 A Perhaps, but I really don't know. His
20 career goal was to be a doctor.

21 Q So in the five years that he's lived with
22 you, you never said, "I think it'd be great if you
23 went out and got a job"?

24 A He does not have time with this lawsuit.

25 Q And my -- my question was that you've never

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1 MS. TALBERT: Object to the form.

2 THE WITNESS: First of all, that's the
3 status that y'all -- you know, the school has left
4 him in. And, you know, he was willing to, you know,
5 go through the probation. It was stopped. And --
6 and he could have continued with the residency and
7 finished.

8 MR. STEPHENS: Move to strike as
9 non-responsive.

10 MR. SECREST: Join.

11 Q (By Mr. Bruce) My question, Ms. Snyder,
12 was: Would you be willing to go see a physician that
13 has not had any medical practice in five years?

14 A Obviously not. You know, you'd need to, I
15 mean, verify they have a license, first of all.
16 Jeffrey never had a license when he completed the 12
17 months successfully. The form was never turned in.

18 Q My understanding is that Dr. Snyder has
19 been at every deposition in this case so far; is that
20 correct?

21 A I don't understand you.

22 Q Has your son attended every deposition in
23 this case so far?

24 A I don't know.

25 Q Did you ever discuss with him today why